



MCI Communications
Corporation

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Leonard S. Sawicki
Senior Manager
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FEDERAL COMMUNICATIONS COMMISSION
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January 20, 1995

Mr. William F. Caton
Secretary
Federal Communications Commission
Room 222
1919 M Street NW
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

Re: CC Docket 92-77; Billed Party Preference

Dear Mr. Caton:

Today, MCI sent the attached letter to Chairman Hundt. I also provided copies to Karen Brinkman of the Chairman's staff and Kathleen Wallman, Chief of the Common Carrier Bureau. As required by Section 1.1206 of the Commission's Rules, I am enclosing two copies with this note. Please include them in the record of this proceeding.

Sincerely,

Leonard S. Sawicki

cc: Ms. Brinkman
Ms. Wallman

No. of Copies rec'd 021
List A B C D E



**MCI Telecommunications
Corporation**
1801 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

January 20, 1995

The Honorable Reed Hundt
Chairman
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Dear Chairman Hundt:

One of MCI's top public policy priorities is billed party preference (BPP). Implementation of BPP would bring equal access to the "0 Plus" (operator services and calling card) market for the first time and would permit consumers to exercise the same right to choose their long distance carrier when they make a calling card or other 0 Plus call as they have had in the "dial 1" arena for years. Last May, the FCC made a tentative finding that BPP was in the public interest. When Bert Roberts of MCI visited you last year, he expressed the hope that the Commission would take final action to approve BPP quickly.

Unfortunately, that has not happened. While the Commission did gather additional data regarding the costs and benefits of BPP during 1994, it has still not issued a final order in this old proceeding. Meanwhile, consumers continue to be deprived of effective equal access in this market, and AT&T and the local exchange carriers retain an effective monopoly on 0 Plus dialing. In addition, some of those carriers have accelerated their efforts to exploit this structural advantage and have embarked on advertising campaigns, highlighting the ease of dialing "0 Plus" and the difficulty of dialing access codes or additional digits which are required to access other carriers' services. I have enclosed some marketing information from Bell Atlantic and Southwestern Bell as examples of these efforts. Bell Atlantic colorfully characterizes the "spellaphone" required of other carriers'



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services and emphasizes the ease of use of its own "0 Plus" service. This is the same Bell Atlantic that opposes BPP, citing the allegedly excessive costs of implementation. Its comments about the costs of implementation of BPP should be viewed in light of its true motives, laid bare by its advertising campaign.

After the Commission's tentative findings early last year, it seemed that the FCC would finally dispose of this important issue. It has not. Indeed, it seems that the local telephone companies have been emboldened by the absence of a final order in this matter and are dumping large sums of advertising dollars into the marketplace to help them leverage their unfair advantage.

If you have any questions about this matter, please call me at 202-887-2124. I would be happy to speak with you at your convenience.

Sincerely,



Laurence E. Harris
Senior Vice President
Public Policy

Enclosures



VIDEO MONITORING
SERVICES
OF AMERICA, INC.

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(203) 541-5477 / Fax (203) 541-5478
1001 Fourth Avenue, San Diego, CA 92101
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A BURBANK ARTICLE

DATE: DECEMBER 5, 1994
TIME: 4:20 PM
STATION: WJFK-FM
LOCATION: WASHINGTON DC
PRODUCT: BELL ATLANTIC
LENGTH: :60
CODE: 9412-0749

TRANSCRIPT

SPELL A PHONE

(BKG MUSIC: ROCKABILLY)

MALE: A little history lesson here. In 1876, Alexander Graham Bell invented the spellaphone. Oh, I'm sorry. Mr. Bell invented the telephone, the device you use to tell things to people who aren't with you. The "spellaphone" wasn't invented until recently when they came out with those collect call 800 numbers, you know, the numbers that aren't really numbers but words you have to spell out? 1-800-THIS, 1-800-THAT, 1-800-BLAH-BLAH-BLAH. Give me a break. What happened was something that used to be easy became a spell-a-thon. Now, the fastest, easiest way to make a collect call is the way you've always done it. Dial 0 PLUS. You just dial "0" plus the area code, and the number you want. 0 PLUS, it's even ten less digits than one of those 800 numbers. So give your digits a break. Dial 0 PLUS and avoid those pesky collect call calluses. 0 PLUS dialing from Bell Atlantic, the heart of communication.

///

1+222 1-800-OPERATOR 1-800-COLLECT 10ATT 1-800CALLATT 10+288 10+333
 800-674-7000 10+222 1-800-OPERATOR 1-800-COLLECT 10ATT 1-800CALLATT 10+288
 1+333 1-800-674-7000 10+222 1-800-OPERATOR 1-800-COLLECT 10ATT 1-800CALLATT

How can you make collect and calling card calls
 without wasting time dialing all these numbers?

10ATT 1-800CALLATT 10+288 10+333 1-800-674-7000 10+222 1-800-OPERATOR
 800-COLLECT 10ATT 1-800CALLATT 10+288 10+333 1-800-674-7000
 800-OPERATOR 1-800-COLLECT 10ATT 1-800CALLATT 10+288 10+333 1-800-674-7000
 1+222 1-800-OPERATOR 1-800-COLLECT 10ATT 1-800CALLATT 10+288 10+333
 800-674-7000 10+222 1-800-OPERATOR 1-800-COLLECT 10ATT 1-800CALLATT 10+288
 1+333 1-800-674-7000 10+222 1-800-OPERATOR 1-800-COLLECT 10ATT 1-800CALLATT
 1+288 10+333 1-800-674-7000 10+222 1-800-OPERATOR 1-800-COLLECT 10ATT
 800CALLATT 10+288 10+333 1-800-674-7000 10+222 1-800-OPERATOR 1-800-COLLECT
 10ATT 1-800CALLATT 10+288 10+333 1-800-674-7000 10+222 1-800-OPERATOR
 800-COLLECT 10ATT 1-800CALLATT 10+288 10+333 1-800-674-7000 10+222
 800-OPERATOR 1-800-COLLECT 10ATT 1-800CALLATT 10+288 10+333 1-800-674-7000

Just dial "0"

Now you can make collect and calling card calls
 without wasting time dialing all these numbers.
 Just dial "0" and you're on the line.

For more information, call 1-800-674-7000. The toll-free
 number is available 24 hours a day, 7 days a week.
 Or, write to: Southwestern Bell Telephone Company,
 P.O. Box 1000, Dallas, Texas 75201.

For more information, call 1-800-674-7000. The toll-free
 number is available 24 hours a day, 7 days a week.
 Or, write to: Southwestern Bell Telephone Company,
 P.O. Box 1000, Dallas, Texas 75201.



Southwestern Bell Telephone